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10 UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF CALIFORNIA
12 FRESNO DIVISION
13

14 RONNIE LEE HILL, JR.,
15

16 Plaintiff,
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18 v.
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20 KILOLO KIJAKAZI,
Acting Commissioner of Social Security,
21

22 Defendant.¹
23

No. 1:21-cv-00265-EPG

STIPULATION AND ORDER FOR EXTENSION
TO FILE DEFENDANT'S OPPOSITION TO
PLAINTIFF'S OPENING BRIEF

(ECF No. 14)

24 IT IS HEREBY STIPULATED, by and between Ronnie Hill (Plaintiff) and Kilolo
25 Kijakazi, Acting Commissioner of Social Security (Defendant), by and through their respective
26 counsel of record, that, with the Court's approval, Defendant shall have an extension of time of
27 sixty (60) days to file a Response to Plaintiff's Opening Brief. This is Defendant's first request
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¹ Kilolo Kijakazi became the Acting Commissioner of Social Security on July 9, 2021. Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Kilolo Kijakazi should be substituted, therefore, for Andrew Saul as the defendant in this suit. No further action need be taken to continue this suit by reason of the last sentence of section 205(g) of the Social Security Act, 42 U.S.C. § 405(g).

1 for an extension on her Response to Plaintiff's Opening Brief. The current due date is January 5,
2 2022. The new date will be March 6, 2022. All other deadlines will extend accordingly.

3
4 Good cause exists for this request. Defendant's counsel has worked diligently to meet the
5 timelines provided by the Court but has been prevented from doing so by her busy schedule.
6 Defendant's counsel has seventy-one other active cases in various stages of litigation and 24
7 responsive briefs due in the next 60 days including two Ninth Circuit answering briefs.
8 Additionally, Defendant's counsel has other responsibilities with another practice group in her
9 office where the work cannot be extended. Defendant's counsel is also covering a colleague's
10 workload who is out on long-term family leave. Defendant requests this extension in good faith,
11 and with no intent to delay these proceedings unnecessarily. Defendant apologizes to the Court
12 for any inconvenience caused by this delay.

13 Respectfully submitted,

14
15 DATE: December 20, 2021

/s/ Melissa Newel
MELISSA NEWEL
Attorney for Plaintiff
(as approved via email)

18 PHILLIP A. TALBERT
Acting United States Attorney

19 DATE: December 20, 2021

By s/ Margaret Lehrkind
MARGARET LEHRKIND
Special Assistant United States Attorney

22 Attorneys for Defendant

ORDER

Based on the above stipulation (ECF No. 14), IT IS ORDERED that Defendant shall file Defendant's response to Plaintiff's opening brief no later than March 7, 2022.² All other deadlines in the Court's scheduling order are extended accordingly.

IT IS SO ORDERED.

Dated: **December 22, 2021**

/s/ Eric P. Gray
UNITED STATES MAGISTRATE JUDGE

² While the stipulation requested an extension until March 6, 2022, that day is a Sunday, and thus the Court sets March 7, 2022 as the applicable deadline.